

## Amendment/Response

Reply to Office Action of May 19, 2004

**REMARKS/DISCUSSION OF ISSUES**

Applicant acknowledges the Examiner's statement that claims 5, 6 and 7 would be allowable if rewritten in independent form. It is, however, respectfully requested that the rewriting of claims 5, 6 and 7 in independent form be held in abeyance pending completion of the prosecution of this application on its merits. In addition, the Examiner is requested to indicate if the drawings filed with this application are accepted or objected to by the Examiner.

**REJECTION UNDER 35 USC §102**

Referring now to the merits of the rejection of claims 1-4 and 8-13, these claims have all been rejected under 35 U.S.C. §102 (e) as being anticipated by Jung, U.S. Patent No. 6,412,952. This rejection is, respectfully, traversed.

S. Jung, U.S. Patent No. 6, 412,952, "CRT COUPLING APPARATUS OF PROJECTION TELEVISION" discloses two embodiments of a CRT coupling apparatus for a projection television. It is the position of the Official Action, as to independent claims 1 and 11, that Jung discloses an apparatus and article of manufacture for compressively securing a cathode ray tube (CRT) to a coupler in a projection television system comprising a first and a second spring, a mechanical coupling means for coupling the first and second springs together, first securing means for attaching the first spring to a coupler, and second securing means for securing the CRT to the assembled spring arrangement.

Referring to the analysis of the Jung patent as set forth on page 3 of the Official Action, it is respectfully submitted that there is no disclosure, teaching or suggestion of a mechanical coupling means for coupling the first and second springs together (emphasis added). While the Official Action refers to the Abstract, Fig. 2, elements identified by reference numerals 12 and 14, and column 2, lines 39-43 of the Jung patent, such an analysis is not correct. While Fig. 2 of the Jung patent discloses a spring wire 14, but that spring wire is a single unitary spring wire which extends about the frontal portion of the CRT. What the Official Action characterizes as a 'spring 12', is in actuality a CRT bracket (column 2, lines 39 and 40). The CRT bracket 12 is used to secure the CRT 10 to the coupler 20 as clearly illustrated in Fig. 2. Spring wire 14 is a unitary spring, and CRT bracket 12 is not a spring and provides no spring function. Coupler 20

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clearly is not a mechanical coupling means for coupling the first and second springs together (emphasis added), because there is only one spring, 14, CRT bracket 12 is not a spring and accordingly the coupler 20 does not and could not join two springs together. Reconsideration of this rejection is requested.

Referring now to Claim 2, while reference numeral 14 refers to a spring wire, there is no disclosure, teaching or suggestion that the "spring wire" is constructed of sheet metal. It is respectfully submitted that the spring wire 14 of Jung does not, and cannot, function in the manner of the second spring 14 of Applicant's invention which is described on page 3, lines 9-12 of the specification.

With reference to Claim 3, the second embodiment of the Jung patent does disclose two spring wires 80. However, whether or not these spring wires have a generally elongated shape in a first plane, there is simply no teaching in the Jung patent that the two spring wires 80 are coupled together. They are clearly illustrated as two separate and independent un-joined structures.

Referring now to Claim 4, the addition of ground plate 15 to spring wire 14 does not perform the function of the structure sets forth in this claim. The only disclosure and teaching of the function which the "earth plate 15" performs, is that the spring wire 14 is coupled to it and the earth plate 15 contacts the back plate 11 of the CRT 10. From the Abstract it is clear that the function of the earth plate 15 is to draw static electricity generated in the CRT away from the CRT (see Jung Abstract).

Referring to the objection of claims 8-10, even assuming arguendo that the statements concerning Claims 8-10 as set forth in the Official Action are correct, these claims are believed to be allowable in view of their dependency from Claim 1.

Lastly, referring to the rejection of Claims 12 and 13, assuming, arguendo, that the statements set forth in the Official Action are correct, these claims are still believed to be allowable in view of their dependency from Claim 11.

The prior art made of record:, M. Shinobu, U.S. Patent No. 6,369,864; M. Shinobu U.S. Patent No. 6,496,232 and E. Fulkerson et al., U.S. Patent No. 6,603,614 each have been carefully

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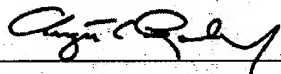
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reviewed. However, this prior art is believed to be no more pertinent to Applicant's invention than the primary reference, Jung. Accordingly, it is not believed that any further discussion of these references is necessary.

**CONCLUSION**

In view of the foregoing, Applicants respectfully request that the Examiner allow all of the claims pending in the application. If the Examiner is of the opinion that the prosecution of this application may be expedited by personal contact, the Examiner is respectfully requested to contact Mr. Eric M. Bram (**not the undersigned**) at (914) 333-9635.

Respectfully submitted,



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